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Federal Communications Commission
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In the Matter of

*Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Eatonton and Lexington, Georgia)*

MB Docket No. 04-379
RM-11086

Filed With: **Office of the Secretary**

Directed To: **Assistant Chief, Audio Division, Media Bureau**

REPLY COMMENTS OF GEORGIA-CAROLINA RADIOCASTING, LLC

Georgia-Carolina Radiocasting, LLC, by its attorney, hereby submits its Reply Comments with respect to the *Notice of Proposed Rulemaking*, DA 04-3056 (Sept. 27, 2004), released with respect to this proceeding. With respect thereto, the following is stated:

Although Middle Georgia evidently filed a gain and loss study by Supplement that was filed simultaneously with Georgia-Carolina's original Comments, as that study shows, as a result of the proposed WMGZ move, "a total of 6,394 persons would experience a loss in service presently offered by WMGZ." The Study is of limited use, insofar as it fails to disclose or analyze whether any of that loss area is underserved.

More importantly, as stated previously, Georgia-Carolina has studied the proposed facility, and as seen in Attachment A to its Comments, a tower located at the coordinates proposed by Middle Georgia, would be located approximately 2.9 kilometers due South from the sole runway at the Washington-Wilkes Airport. Any tower built at that specified location would be limited in height, to evidently no more than 123.77 meters AGL (286.5 meters AMSL), and as seen in Attachment B to Georgia-Carolina's comments, at that height, operating at maximum

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power, the proposal would fail to place a minimal city-grade contour over any portion of the community of Lexington. In its Reply Comments, Middle Georgia argues that there are other site (*i.e.*, other, unproposed, reference points) at which it believes it could achieve the requisite coverage. In essence, in response to Georgia-Carolina's Comments, Middle Georgia is seeking at this late date to amend its proposal, which it should not be allowed to do. Middle Georgia also claims, without support, that the FAA "often" approves towers that exceed certain criteria. Middle Georgia provides no expert opinion that such approval is likely, or appropriate in this case, which involves a tower located only 2.9 kilometers from an existing airport runway.

Middle Georgia is proposing to remove the sole full-time service from a robust community of 6,764 persons, and proposes to instead allot the channel to Lexington, a community of only 239 persons. As noted previously, insofar as Eatonton would be left with on a daytime-only station (Station WKVQ). This does not represent a preferential arrangement of allotments. *Accord, Clayton, GA, and Sylva, GA, DA 04-1616 (MB 2004).*¹

For all of these reasons, Middle Georgia's proposal must be denied.

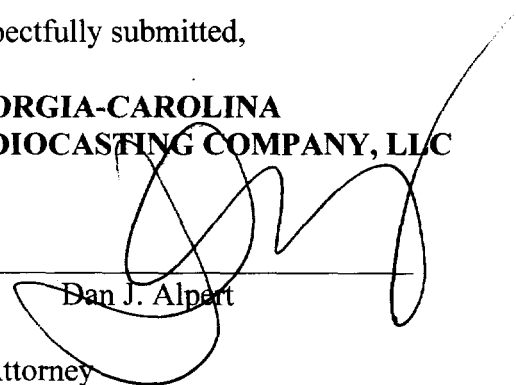
¹ In its Comments, Georgia-Carolina noted WKVQ has been silent repeated times in the recent past. Although Middle Georgia characterizes the statement as "blatantly false," it introduces a Declaration which, although characterizing the period of inoperation as "rare," *confirms* that the station has been off the air, albeit allegedly for periods evidently involving less than a day.

Accordingly, Georgia-Carolina Radiocasting Company, LLC requests that these Reply Comments be accepted, and that the proposal of Middle Georgia Communications, Inc. for reallocation of Station WMGZ from Eatonton, Georgia, to Lexington, Georgia, be denied.

Respectfully submitted,

**GEORGIA-CAROLINA
RADIOCASTING COMPANY, LLC**

By: _____


Dan J. Alpert

Its Attorney

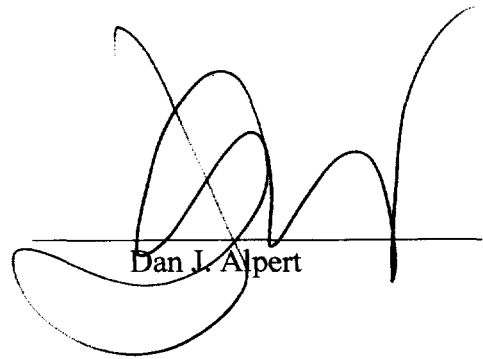
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December 3, 2004

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the attached Reply Comments of Georgia-Carolina Radiocasting, Company, LLC, are being served, via First-Class Mail, upon the following:

Lauren A. Colby, Esq.
10 E. Fourth Street
P.O. Box 113
Frederick, MD 21705-0113



Handwritten signature of Dan J. Alpert, consisting of a stylized, cursive script. The signature is written in black ink and is positioned above the printed name "Dan J. Alpert".

Dan J. Alpert